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official capacity as Attorney General of the State of
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9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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14 **NATIONAL ASSOCIATION FOR**
15 **GUN RIGHTS, INC., a non-profit**
16 **corporation; and Ronald Givens, an**
individual,

17 Plaintiffs,

18 v.

19 **ROBERT BONTA, in his official**
20 **capacity as Attorney General of the**
21 **State of California, and DOES 1-25,**
inclusive,

22 Defendants.
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Case No. 2:22-cv-04543-GW-PLAx

**JOINT STIPULATION TO
AUTHORIZE PLAINTIFFS TO
FILE A SECOND AMENDED
COMPLAINT, AND TO EXTEND
THE DEADLINE FOR
DEFENDANT TO RESPOND TO
THE OPERATIVE COMPLAINT**

Courtroom: 9D

Judge: Hon. George H. Wu

1 Defendant Attorney General Rob Bonta and all Plaintiffs, by and through their
2 attorneys of record, stipulate as follows:

3 WHEREAS, on July 1, 2022, Plaintiffs filed their complaint in this action;

4 WHEREAS, on August 25, 2022, Plaintiffs filed their first amended complaint
5 in this action (the “Complaint”);

6 WHEREAS, on November 7, 2022, Plaintiffs served the Complaint on
7 Defendant;

8 WHEREAS, on November 10, 2022, Defendant filed a Stipulation Extending
9 Time to Respond to Initial Complaint by Not More Than 30 Days (L.R. 8-3), under
10 which Stipulation Defendant’s response date to the Complaint became December
11 28, 2022 (Dkt. No. 21);

12 WHEREAS, on November 30, 2022, an outside law firm retained by
13 Defendant released its independent report concerning the incident that is the basis
14 of the Complaint (oag.ca.gov/dataexposure);

15 WHEREAS, on December 15, 2022, the Court granted Defendant an
16 extension of time (to January 24, 2023) to respond to the Complaint for two
17 reasons: (1) Plaintiffs were evaluating whether to amend the Complaint in light of
18 the release of the independent report; and (2) to accommodate counsel’s holiday-
19 related absences,

20 WHEREAS, after reviewing the independent report, Plaintiffs seek to amend
21 the Complaint, and Defendant does not oppose the amendment of the Complaint,

22 WHEREAS, the parties have agreed to the following schedule for Plaintiffs to
23 amend the Complaint and for Defendant to respond to a second amended
24 complaint:

25 February 23, 2023: Deadline for Plaintiffs to file a second amended complaint

26 March 27, 2023: Deadline for Defendant to respond to the second amended

27 complaint or to the existing Complaint, if a second amended complaint is not
28 filed by February 23, 2023.

1 WHEREAS, a [Proposed] Order approving this Stipulation is attached
2 herewith as required by Local Rules 7-1, 8-3, and 52-4.1;

3 NOW THEREFORE, THE PARTIES HEREBY STIPULATE AS
4 FOLLOWS, SUBJECT TO THE APPROVAL OF THE COURT:

5 Plaintiffs shall have until February 23, 2023, to file a second amended
6 complaint.

7 Defendant shall have until March 27, 2023, to file a response to the second
8 amended complaint or to the existing first amended complaint, if a second amended
9 complaint is not filed by February 23, 2023.

10 IT IS SO STIPULATED.

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12 Dated: January 20, 2023

ROB BONTA
Attorney General of California
P. PATTY LI
Supervising Deputy Attorney General

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16 */s/ John W. Killeen*
JOHN W. KILLEEN
Deputy Attorney General
Attorneys for Defendant
Robert Bonta, in his official capacity
as Attorney General of the State of
California

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20
21 Dated: January 20, 2023

22
23 */s/ David A. Warrington*
HARMEET K. DHILLON
MICHAEL A. CUMBO
MARK P. MEUSER
DAVID A. WARRINGTON
GARY M. LAWKOWSKI
Attorneys for Plaintiffs
National Association for Gun Rights
and Ronald Givens

1 I, John W. Killeen, hereby attest that all other signatories listed above concur
2 in this filing's content and have authorized me to make this filing.

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4 Dated: January 20, 2023

/s/ John W. Killeen

JOHN W. KILLEEN

Deputy Attorney General

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